

DEFICIENCY PROGRESS REPORT – UPDATE 6

Date Submitted: January 7, 2010

CUPA: NAPA COUNTY DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Evaluation Date: March 19 and 20, 2008

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Update 3 Submittal Date: February 10, 2009

Status: Deficiencies 3, 16, and 18 remain outstanding.

Update 4 Submittal Date: May 11, 2009

Status: Deficiencies 3, 16, and 18 remain outstanding.

Update 5 Submittal Date: August 9, 2009

Deficiencies Corrected: 3 and 16

Status: Deficiencies 18 remains outstanding

Update 6 Submittal Date: December 7, 2009

Deficiencies Corrected: 18

Status: All deficiencies have been corrected. No deficiencies remain outstanding.

Deficiency 18: The CUPA's inspection report does not document or detail the inspection, but consists of summary of violations or notice to comply (NTC) only information. There is no record of components reviewed.

Corrective Action by August 14, 2008: The CUPA will develop a detailed inspection report showing the items reviewed.

CUPA Update 1: Napa County DEM utilizes a checklist for UST inspections and writes the observation, violation, and corrective action on a separate inspection sheet. If facilities want a copy of the entire inspection checklist now or in the future, they may request it and it will be provided.

Comments to Update 1: *The SWRCB staff is pleased with the progress the CUPA is making in correcting this deficiency. Please provide a copy of the inspection checklist in the next status report. In addition, please provide information on how the checklist will be maintained with the violation summary as part of the complete inspection report in the facility file.*

CUPA Update 2: Napa County DEM utilizes a checklist for UST inspections and writes the observation, violation, and corrective action on a separate inspection sheet. If facilities want a copy of the entire inspection checklist now or in the future, they may request it and it will be provided.

Comments to Update 2: *The CUPA has neither provided a copy of the inspection checklist nor an explanation of how it is used to document that a complete inspection was conducted, nor how the violation summary portion and the inspection checklist will be maintained as part of the complete report, as requested.*

Please provide a copy of the inspection checklist and provide information on how the checklist will be maintained with the violation summary as part of the complete inspection report in the facility file in your next status report.

Note: *A comprehensive inspection report showing all items reviewed during the inspection and detailing the findings of the inspection (compliance as well as non-compliance) is necessary to ensure that regulatory requirements are met (including SOC). These become part of the detailed records necessary to meet California Code of Regulations title 27 reporting requirements, in support of the summary reports submitted.*

CUPA Update 3: Please find the enclosed checklist. Our new database has a field to document the level of compliance/non-compliance. NCDEM utilizes a checklist for UST inspections and writes the observation, violation, and corrective action on a separate inspection sheet. If facilities want a copy of the entire inspection checklist now or in the future, they may request it and it will be provided.

Comments to Update 3: *The State Water Board has reviewed the NCDEM checklist. It is not clear to State Water Board staff how an inspector would use the checklist to document compliance and, in particular, determine if the facility is in significant operational compliance for release detection and release prevention. The State Water Board staff would like to review several completed inspection sheets with your next update to see how the inspectors verified compliance.*

CUPA Update 4: The included checklist is our new checklist that will be used with our new data management software. The checklist requires the inspector to check the status of each line item as either being either in or out of compliance with the standard. Additionally, the SOC status of the facility is also printed on the inspection form. We anticipate going live with the new system in June. We would be happy to send you a completed inspection report at that time.

SWRCB Response to Update 4: Please provide several completed inspection sheets for review when available.

CUPA Corrective Action Update 5: Please find a copy of an inspection attached. I have also attached a copy of our electronic inspection form so that you can see what items are inspected.

SWRCB's Response to Update 5: *The SWRCB is pleased to see that Napa DEM has developed a comprehensive UST inspection checklist. Attached, please find our comments regarding the checklist. On the next progress report, please submit a revised version*

indicating any changes made. If the CUPA prefers to submit this sooner, please contact us so that we can help with clearing this deficiency sooner.

CUPA Corrective Action, (Update 6): The CUPA has submitted a new UST checklist for SWRCB review.

SWRCB Response to Update 6: *SWRCB considers this deficiency to be corrected.*